

AARON E. DE LEEST (State Bar No. 216832)
adeleest@DanningGill.com
SHANTAL MALMED (State Bar No. 351496)
smalmed@DanningGill.com
DANNING, GILL, ISRAEL & KRASNOFF, LLP
1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067-6006
Telephone: (310) 277-0077
Facsimile: (310) 277-5735

Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee

FILED & ENTERED

MAR 29 2024

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY bolte DEPUTY CLERK

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,
Plaintiff,
vs.

Adv. No. 8:23-ap-01064-SC

**STIPULATED JUDGMENT AGAINST
DEFENDANT ROBERT J. MCLELLAND
TO AVOID LIENS**

J-SANDCASTLE CO., LLC; J-PAD LLC;
STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
AND E. J. GALLIAN,
Defendants.

STATUS CONFERENCE

Date: May 28, 2024
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

Plaintiff Jeffrey I. Golden, Chapter 7 Trustee (the "Plaintiff"), for the estate of
Jamie Lynn Gallian (the "Debtor"), and defendant Robert J. McLelland (the "Stipulating
Defendant"), having lodged on or about January 25, 2024 the Stipulation for Judgment Between
Trustee and Defendant Robert J. McLelland (the "Stipulation for Judgment") (*adv. doc. no. 52*):

1 1. Judgment is entered in favor of the Trustee and against the Stipulating Defendant
2 that the Stipulating Defendant is not a party to any security agreement or agreements that would
3 grant him a security interest in or lien on the manufactured home located at 16222 Monterey Lane,
4 Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA,
5 AC7V710394GB (the "Property").

6 2. Judgment is entered in favor of the Trustee and against the Stipulating Defendant
7 that the Stipulating Defendant has no interest in the Property.

8 3. Judgment is entered in favor of the Trustee and against Robert J. McLelland that the
9 "Statement of Facts" (the "Statement of Facts") that was executed and submitted to the California
10 Department of Housing and Community Development (the "HCD") on or about August 2, 2021,
11 adding "J-Pad LLC or Robert McLelland" as the legal owners (i.e., lienholders) on the certificate of
12 title for the Property and any related lien is avoided and preserved for the benefit of the Debtor's
13 estate.

14 4. Judgment is entered in favor of the Trustee and against the Stipulating Defendant
15 that the following UCC Financing Statement Amendments (UCC-3) and any related liens are
16 avoided and preserved for the benefit of the Debtor's estate.

UCC Filing Date	UCC Type	Filing No.
9/8/2021	UCC-3 Amendment	U210083394336
9/12/2021	UCC-3 Amendment	U210084251426
9/12/2021	UCC-3 Amendment	U210084255728
9/12/2021	UCC-3 Amendment	U210084256326
9/12/2021	UCC-3 Amendment	U210084251729
9/24/2021	UCC-5 Amendment	U210088103427
9/24/2021	UCC-3 Amendment	U210088103629


23 5. The Trustee and the Stipulating Defendant shall bear their own attorney's fees and
24 costs.

25 6. The Stipulating Defendant shall cooperate in a timely manner with the Trustee to
26 carry out the purpose and effect of the Stipulation for Judgment including executing any further
27 documents that may be required.
28

1 7. Pursuant of Rule 54 of the Federal Rules of Civil Procedure there is no just reason
2 for delay in entry of this judgment against the Stipulating Defendants.

3 ###
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

23
24 Date: March 29, 2024


Scott C. Clarkson
United States Bankruptcy Judge